

Exhibit L

Taylor Pfeifer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

**AFFIDAVIT OF
TAYLOR PFEIFER**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

TAYLOR PFEIFER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 29 Fox Court, Hicksville, New York 11801.
2. I am currently 28 years old, having been born on August 23, 1993.
3. I am the daughter of Raymond Pfeifer, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from kidney cancer on May 28, 2017. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Prior to his illness, my dad was very involved in my life. He coached my sports teams and would always pick me up from school. We would hang out, go to the movies together, go to an arcade or sometimes to theme parks. My dad loved boating, and he'd often take my brother and me out on the boat on his days off. He always made it a point to spend time with his kids as often as possible. He loved to be with us.

6. On September 11th, 2001, I was only eight years old. That was the day I “grew up.” My mother picked my brother and me up from school early. I knew that my dad wasn’t home and probably wasn’t going to be home for a few days. Many of his FDNY brothers had perished that day, and there was no way that he was going to leave that pile until they were found. He was constantly working at the World Trade Center site, day and night, for over three months. He would call us when he could, but that wasn’t often. There was little to no cell reception in the city. Whenever he’d call, he’d say, “We still can’t find this person or that person.” He wouldn’t leave until everyone was found.

7. I learned of my dad’s cancer when I was a junior in high school. It was his day off, and he wasn’t home when I got home from school, which was unusual. My mom wasn’t home either. I had known that something was off with my dad’s health, because normally, my dad would be running out the door whenever his volunteer firefighter pager would go off. He wasn’t doing that anymore because he couldn’t. Something was up with his leg. We thought maybe he had just sprained something. When my mom came home, she sat us down and told us that dad had cancer – full-blown Stage IV kidney cancer, all throughout his body. I have never felt so shocked and scared in my life.

8. My dad was my best friend. I was determined to take care of him. I wouldn’t leave his side. As I grew older and my dad’s illness progressed, I started to become his full-time caretaker. I went on FMLA leave from work to look after my father. He only wanted me to cook for him, so I cooked for him every night. We would spend Christmases and birthdays at the hospital. He was on chemotherapy, so no one could come over to our house because of my dad’s weakened immune system.

9. Watching my father deteriorate year after year was simply horrible. His mental health, as well as his physical health, worsened. The mental part was terrible. It was also hard to watch him suffer from the pain of cancer and the side effects of the medications. I had to give him his medications every day and night. Toward the end, we started providing hospice care for him at home. He was on fentanyl patches, and the hospice nurses had to teach me how to apply them. My father wasn’t lucid. He would wake up in the middle of the night and tear off the fentanyl patches because they were bothering him. Then, he’d immediately go into withdrawal. It was really scary, just a nightmare.

10. I am still not the same since my father's illness and death. I still can't really talk about him. His death ruined me. My father was my best friend. Since he passed away, I've been on anti-depressants and anxiety medications. I always think something bad is going to happen to me. I live in fear every day. My dad's death really impacted my mental health.

11. My dad missed out on so much. His life was stolen from us by these terrible people who committed horrendous acts on 9/11. I'm getting married this coming August, and he won't be there to walk me down the aisle. He'll never be able to meet his grandchild or any future grandchildren. It's so unfair. I truly believe that anyone responsible for 9/11 in any way should be held accountable.


TAYLOR PFEIFER

Sworn to before me this
19th day of May, 2022



KEVIN P. MATTHEWS
NOTARY PUBLIC
State of New York
No. 4841605
Qualified in Suffolk County
Commission Expires April 30, 2023

Terence Pfeifer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF
TERENCE PFEIFER**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

TERENCE PFEIFER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2423 Langen Drive, Seaford, New York 11783.

2. I am currently 30 years old, having been born on December 18, 1991.

3. I am the son of Raymond Pfeifer, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from kidney cancer on May 28, 2017. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad was very involved in my life. He was the coach of all of my sports teams – soccer, baseball, and football. He was a great coach, and my teammates loved him. He loved to spend time with my sister and me. He was a very present father.

6. I was in elementary school on 9/11. I remember that mother pulled us out of school early that day and she was visibly upset. She told my sister and me that dad went down

to the World Trade Center and wouldn't be home for a while. He didn't come home for a few months. He worked at Ground Zero every day for about two months. When he finally returned home, he didn't want to describe the conditions or anything he saw to me. He hid it from us and never talked about it. Even after I became a fireman myself, he still didn't want to talk about it with me.

7. In the years that followed, my dad developed a bad limp. I'd ask him if he was alright, and he would tell me he was fine. Finally, in the Fall of 2009, he just couldn't walk anymore. He went for an x-ray, and they found that his bones were deteriorating due to cancer. He didn't even know that he had cancer. His diagnosis was a complete shock to all of us. I remember that day vividly because I had a football game.

8. My dad was going through hell. He had over nine surgeries trying to remove his cancer, but the cancer kept spreading. I was always taking time off work to drive him to appointments and take care of him. Toward the end, when he was in hospice, I was living at home. I didn't go back to work because I wanted to spend time with my father. It was sad to watch. He was dying slowly in front of me. No child should ever have to see that happen to their parent.

9. I personally felt like my father died on 9/11. He was never the same person after that day. He had a lot of survivor's guilt. All twelve of his brothers from his firehouse died on that day, plus at least fifty of his other friends. I became a fireman five years ago, right before my dad passed away. It is very difficult for me because I work with all of these guys who still talk about my dad. I always wish that my dad was still here so I could talk to him about being a fireman. I wonder what his view on my work would be, and I wish I could know how he would've responded in certain situations.

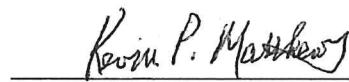
10. My wife is having a baby next week, and my dad won't be here to meet his first grandchild. He wasn't alive to attend my wedding. There are so many milestones that my father wasn't here for, and that he won't ever be here for.

11. I want people to know how much my father loved the Fire Department. He would've worked for the FDNY for another twenty years if the illness didn't cut his life short. When he had to retire due to his illness, it crushed him. The FDNY was like a second family to

him. I miss my dad, and I hope that I can make him proud and be as respected in the FDNY as he was.


TERENCE PFEIFER

Sworn to before me this
19th day of May, 2022


Notary Public

KEVIN P. MATTHEWS
NOTARY PUBLIC
State of New York
No. 4841605
Qualified in Suffolk County
Commission Expires April 30, 2023

Madeline Ann Quinn

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF
MADELINE ANN QUINN**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF QUEENS)

MADELINE ANN QUINN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 223-23 57th Avenue, Bayside, New York 11364.

2. I am currently 67 years old, having been born on November 24, 1954.

3. I am the wife of Michael V. Quinn, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from cancers of the prostate and lung on June 5, 2016. It was medically determined by the World Trade Center Health Program that these illnesses were causally connected to their exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Michael and I were happily married for 38 years. He was not only my husband, he was my best friend. We were inseparable and had a beautiful life together. Michael and I did everything together. We liked to take long walks and just talk, go for runs, and go shopping. We enjoyed vacationing or just sitting on the patio listening to music. Our favorite time was Friday

nights, when we would order in pizza and watch a movie. Our most memorable experience was the birth of our son, Michael. My husband was so proud and happy when he became a father.

6. Michael was an NYPD first responder who was at Ground Zero conducting search and recovery. He began on September 12th and worked each day for several months on the pile, identifying victims and digging through the rubble. My husband was very diligent in going for screenings with the World Trade Center Health Program, and he followed up with his own doctors on a regular basis. After two separate biopsies, he was diagnosed with prostate cancer, and later with lung cancer, both of which were linked to his time at Ground Zero.

7. When my husband was diagnosed with cancer, both of our lives totally changed. It was a devastating and emotional time for our entire family. I did everything I could to provide my husband with support and encouragement through this difficult time. I was my husband's primary caretaker. I watched him suffer with cancer for three long years. It was difficult, but I was determined to help him.

8. In order to focus on caring for my husband, I had to change my work schedule from full-time to part-time so that I could stay home and attend to his needs. He underwent prostate surgery, after which he needed constant care. He also underwent 28 radiation treatments. I would drive him to the hospital for his treatments and then care for him when we returned home. It was so hard to see such a strong man suffer and be in so much pain. He deteriorated more and more every day.

9. His last hospital admission, which lasted three weeks, was extremely emotional, stressful, and sad for me and our family. I lived in the hospital ICU for those three weeks, never leaving his bedside. My sister and son would come to the hospital every day to keep us company. Michael knew that his family was there for him. Unfortunately, he never recovered and passed away in the hospital.

10. Michael was a very proud man. His main concern was providing for his family and making sure that we were happy and financially secure. He was honored to be an Assistant Chief of the NYPD, and he loved his job. He was admired and respected by everyone who knew him.

11. My husband's passing was a devastating tragedy that took the love of my life. I can honestly say that my life will never be the same without my beloved husband. My heart is forever broken. I love and miss my husband more than ever! He is forever in my heart. This

tragedy was a needless loss of a beautiful life. Someone should be held accountable for this senseless loss.


MADELINE ANN QUINN

Sworn to before me this
17th day of May, 2022


Notary Public

Susana Ung
Notary Public, New York
Queens County Lic# 01UN6343297
Commission Expires: 6/6/2024

Michael Dee Quinn

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF
MICHAEL DEE QUINN**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF QUEENS)

MICHAEL DEE QUINN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 223-23 57th Avenue, Bayside, New York 11364.

2. I am currently 28 years old, having been born on June 29, 1993.

3. I am the son of Michael V. Quinn, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from cancers of the prostate and lung on June 5, 2016. It was medically determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father and I had a great relationship. We were very close and did many activities together. We loved basketball, baseball, running, karate, and going on family vacations. My father was my role model. He was a very important person in my life.

6. My father was an NYPD first responder, who was at Ground Zero conducting search and recovery. He began responding on September 12th and worked each day for several months on the pile, identifying victims and digging through the rubble. My father was very diligent in going for screenings with the World Trade Center Health Program, and he followed up with his own doctors on a regular basis. After two separate biopsies, he was diagnosed with cancer.


7. I was away at college when my father was first diagnosed, so I didn't learn of his illness until I returned home. I was shocked and devastated to learn that he was diagnosed with cancer. I later found out that he didn't want me to know while I was in school because he didn't want me to worry about him. My father's illness was very emotional and difficult for me. Because I was in college, I couldn't contribute as much to his care. However, I did everything I could to let him know that I was there for him and that I would do anything he needed. I would come home on the weekends and spend as much time with him as he wanted. Just being home with him made him happy.

8. Due to my father's passing, my entire life changed. I lost so much of my adulthood with him. He is not here to mentor me, encourage me, or provide the guidance and emotional support that I need now and in the future. My father will not be here for important milestones in my life, which deeply saddens me.

9. My father was the most caring, generous, and kind man I ever met. He never let me down. He was there for anyone who needed him. I just hope that I can live on in his legacy and make him proud by becoming the same extraordinary man that he was. I love and miss my father and friend very much.


MICHAEL DEE QUINN

Sworn to before me this
17th day of May, 2022


Notary Public

Lauren A. Fischer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOHNN BASCI, et al,

**AFFIDAVIT OF
LAUREN A. FISCHER**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF QUEENS)

LAUREN A. FISCHER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6256 60th Drive, Maspeth, New York 11378.
2. I am currently 45 years old, having been born on October 31, 1976.
3. I am the daughter of Michael F. Shipsey, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from lung cancer on May 23, 2015. It had been medically determined that his lung cancer was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad was wonderful. He was at every baseball and basketball game, and he hardly ever missed a practice. He was involved in birthdays and graduations and read every report card. He even volunteered for school events. He was a very hard worker, but when it came time for his family, he always took a break. He taught my sister and me to be smart, street smart. Perfect example: when we were old enough to drive, he wouldn't let us behind the wheel until we knew how a car worked. He taught us to change a tire and check the oil, to read maps. He wanted to make sure we were safe. His was very protective. For him, the best way to protect us was to teach us self-reliance.

6. He worked for the New York City Department of Transportation (DOT), and he had a Commercial Driver's License (CDL) to drive trucks and tractors. After September 11, 2001, he was asked to help with the clean-up and clearing the debris. My dad would load his up his truck, cart it to Staten Island, unload it and go back to Ground Zero. He would go back and forth like that numerous times a day, for many days, over a two-month period.

7. After he retired and my parents moved to Florida, he needed to find new doctors down in Florida. I think it was the cardiologist who said he needed an angiogram just to make sure that everything was healthy. They took X rays as part of the angiogram process. They found the spot on his lung, which would end up being cancerous. He started treatment, like chemotherapy. I would say this was in December 2012. If everything stayed good after a year, he'd have a good prognosis. We were almost at the end of that year. I was actually on the phone with my mom when he had, what turned out to be, a seizure—which was caused by the cancer metastasizing to his brain. The tumors were deep in his brain. He got treatment, but there wasn't a lot the doctors could do. It just got so bad.

8. He started falling a lot. It was so hard on my mom. My mom was his sole caregiver. Nobody was really there with her. I would try to go to Florida as much as I could to take some of the stress off her. It was tough, because I was working an hourly-wage job at the time. The cancer affected his memory severely. And his biggest fear was forgetting who we were. He would always apologize in advance, every morning, in case he forgot who we were during the day. He had pneumonia at one point. I went down to stay with him at the hospital then. He was so confused and scared. He couldn't remember why he was in the hospital. He was asking me all these questions, and they wouldn't let me stay with him at the hospital. It was just

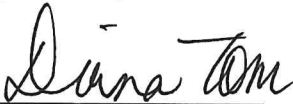
really, really, really difficult. And that was even before they told us that there was nothing they could do for him.

9. In December 2014, we went down to Florida. My parents were supposed to meet us at Disneyland. But that was when my dad started declining a lot, and they couldn't make the trip to Orlando. We saw him on his last birthday at their home, December 21, 2014. My family went back to New York. My parents were supposed to fly up to New York with us for Christmas. But then we got the phone call that he was too sick to fly. So that last Christmas, we weren't with him. My dad went into hospice in February 2015.

10. I arrived at the hospice, the Monday before he died, and I stayed with him until he died on May 23. I was with him 24/7. He was suffering so much. They would give him morphine, but they wouldn't feed him, because he had a DNR—he didn't want anything that prolonged life. The doctor came in and said, you know, this is keeping him suffering. Even though he's on the morphine, he's still in pain. It was on me to stop that. So, I gave him his last drink of water. And it was terrible. He died Saturday morning around 5am. They woke me up to tell me that my dad had died. My dad's death has been, and continues to be, a terrible loss for me.


LAUREN A. FISCHER

Sworn to before me this
28 day of April, 2022


Notary Public

DIANA TOM
Notary Public - State of New York
No. 01TO6381943
Qualified in Queens County
My Commission Expires Oct. 15, 2022

Patricia Thomasian

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF
PATRICIA THOMASIAN**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF QUEENS)

PATRICIA THOMASIAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 9148 88th Road, Woodhaven, New York 11421.

2. I am currently 72 years old, having been born on September 1, 1949.

3. I am the wife of John Thomasian, upon whose 9/11-related injuries my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from complications related to cardiopulmonary disease on March 6, 2014. It was medically determined that his respiratory illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My husband and I had a good relationship. When he wasn't busy with his work at the Fire Department, we would go fishing together. I worked as an administrative assistant at Colgate Palmolive. We both worked so that we could provide a good life for our two daughters. We were a regular American family, nothing out of the ordinary. We had a good marriage, with its ups and downs, but ultimately, we had a good relationship. We loved each other. There was a big change in him after 9/11/2001. We got through it though.

6. John had gotten off work at 6:00 pm the night before 9/11. Of course, he was called back in the next morning. He was down there at the World Trade Center site searching for victims for about a month or so. Then, he stayed another several weeks for the clean-up. It seemed like he was working there forever. He was down there quite a bit, and when he wasn't working, he was going to other firemen's funerals. They were supporting each other. In the beginning, he wasn't home very often; he was working around the clock. Every so often, he would talk about Ground Zero. He didn't go into that much detail because he found it hard to talk about. Seeing people's personal belongings in the rubble, and the smell down there, took a toll on him. The firemen's funerals were the hardest part for him. He knew a lot of guys personally who perished in the collapse of the buildings. It definitely was an emotional burden for him to carry.

7. I noticed John's health changes coming on slowly. After September 11th, he started to develop worse and worse lung issues. I would say about a year or two after 9/11, he started to develop breathing issues. His gastro-esophageal reflux disease (GERD) got worse as well. He would go for lung tests at the Fire Department, and his scores were not good. They would get progressively worse and worse. John retired on the FDNY Lung Bill. He retired on disability at around age sixty.

8. John also began to suffer from asthma. He would become anxious, and his asthma would get even worse. He suffered from obstructive sleep apnea, and it worsened in the years after 9/11 as well. He was given a BiPAP machine to use every night to help him breathe. In 2010, John was diagnosed with ALS which started in his diaphragm. He had trouble breathing and became drained of energy. He was exhausted even just standing in the shower. He lost a lot of mobility. I remember he had difficulty grabbing things or even buttoning his shirt. In the end of 2011, he was put on a ventilator.

9. My life was just turned upside-down. My daughters were still in their twenties. I was of course worried about my husband. He was still lucid for much of the time he was on a ventilator, which was over two years. I was heartbroken watching him. I tried to make things easier for my daughters, but I couldn't change the fact that their father was on a ventilator. I would go back and forth to the hospital every day, just to watch my husband waste away. Emotionally and physically, it was hard. I knew there was going to be a bad outcome, as there were no hopes of him recovering. The thought of losing him was terrifying. The worst part was


knowing I couldn't do anything about it.

10. We had one grandson at the time my husband got sick. Our daughter was pregnant with our second grandson when John was ill, and he was born the day after John was buried. That was heartbreaking. He also missed our younger daughter's wedding. He should have been there for both. He missed out on good times in our lives.

11. John was a great husband. He was proud to be an FDNY fireman. He was so heartbroken that he lost so many of his friends in 9/11. He was never the same. He was a great father, and he was a wonderful grandfather. I know my daughter's lives haven't been the same, and I know my life hasn't been the same since his passing. I'm not sure I'll ever be the same again.


PATRICIA THOMASIAN

Sworn to before me this
8th day of June, 2022


Notary Public

SHAH ALBOSHIN
NOTARY PUBLIC-STATE OF NEW YORK
QUALIFIED IN QUEENS COUNTY
NO. 01AL6386010
COMMISSION EXPIRES JANUARY 22, 20 23

Richard John Walsh

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al,

AFFIDAVIT OF
RICHARD JOHN WALSH

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

RICHARD JOHN WALSH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 20 Bertha Place, Staten Island, New York 10301.
2. I am currently 39 years old, having been born on February 7, 1983.
3. I am the son of Elizabeth Ann Walsh, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from breast cancer on May 4, 2015, at the age of 57. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I had a very close relationship with my mom. She was the heart of our household. She was an amazing listener who gave the best advice on school, career, and relationships. We loved

to spend time together as a family.

6. On 9/11, my mom was working as a nurse. The same day as the terrorist attacks, she took a ferry to Ground Zero. She wanted to help any people who were injured and do whatever she could to support first responders. I don't remember how many days she was there volunteering.

7. In 2008, my mom sat us down at her house to tell us she had cancer and was going to need a double mastectomy. Following the surgery, she had very strong chemotherapy treatments. She was under a lot of stress and became easily frustrated when she felt like a nurse wasn't doing a good job because, as a nurse, she knew how things should be done. I remember that one time she got into an argument with a nurse over the port to her heart during her chemotherapy treatment. I had to step in and defuse the situation. My mom needed help and support at her appointments and when she got home. She was tired all the time. She would get sick from medicine and ask us to get her buckets so she could throw up. One of my brothers is disabled and needs 24/7 care. During her illness, it was difficult for her to take care of him as she always did. She was used to being the leader of our family and support us, but due to her illness, we had to help her, take care of her, and do most things for her. I could tell that it was hard on my mom to be so vulnerable and feel helpless.

8. My mom's illness and death had a big emotional toll on me. I suffered from anxiety and depression for years and had to take medication to treat these conditions. I struggled with losing my mom, who was my biggest supporter. I wasn't able to connect with her once she got sick and had to focus all my energy on helping her, like getting her food, bringing her medicine, checking in on her, and caring for my brother Christopher, who needs 24/7 care to do even basic things like going to the bathroom. I pitched in whenever I could and did whatever was necessary, but it was hard to watch my mom slipping away and to have to fill the void in caring for my brother as

well. I remember the feeling of false hope when she went into remission and was feeling okay. She said at that time that she was feeling good and looking forward to my wedding in the fall and my sister's wedding in the spring. She never made it to either wedding. Not only did the cancer come back, but it had spread, which sent her into a rapid decline. We had to carry on without her at both our weddings even though we were still grieving. I never got to have a mother-son dance. I never got to introduce my children to my mom. She wanted nothing more than to be a grandmother, and she would have been the best. Her passing left a hole in our lives, and even now I have to explain to my son who she was and why she isn't here with us. It breaks my heart when my son asks me if I miss my mom.

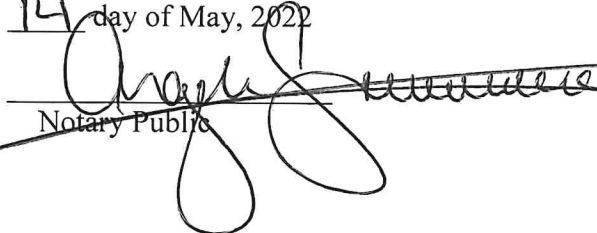
9. My mom's death had a financial impact too. I was living with my parents when my mom was diagnosed with cancer. She kept a roof over my head. I ended up buying a house across the street after her passing to be closer to my dad and brothers.

10. It was devastating to lose my mom at such a young age. She told me in her final weeks how all she wanted was more time and how there was so much more she wanted to do. She wasn't afraid of dying, but she was afraid of leaving us. She wanted to attend my wedding. She wanted to meet my future children. She wanted to be there for our family. My mom was a very special woman, and we will never get this time back with her.



RICHARD JOHN WALSH

Sworn to before me this
14 day of May, 2022



Notary Public

ANGELA M. SPECIALE
Notary Public - State of New York
No. 01SP6390180
Qualified in Richmond County
My Commission Expires: 04/08/2023

Estate of Michael Behette

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

**AFFIDAVIT OF
ANTHONY BEHETTE**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

ANTHONY BEHETTE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 155 82nd Street, Brooklyn, New York 11209.

2. I am currently 63 years old, having been born on August 11, 1958.

3. I am the brother of Michael Behette, upon whose death this claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my brother's estate.

4. My brother passed away from lung cancer on September 17, 2012, at the age of 55. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On March 5, 2020, I was appointed personal representative of my brother's estate in the Kings County, New York Surrogate's Court.

6. Michael and I were very close. Growing up, we went to concerts, sporting events, and movies together. We were at Game 6 of the 1977 World Series, Reggie Jackson's three home-run game. After the game, we went onto the field at Yankee Stadium and took home some grass

and dirt from the playing field. Michael never had children, so when I married and had my own children, Michael became the best uncle in the world. He was an amazing uncle to my two daughters, Danielle and Allison. He would play hide-and-seek with my daughters, build snowmen with them, and take them to the park. We all went on a ski trip to Austria in February 2010. If my daughters wanted something and I said no, they'd ask Uncle Mikey. He had a great sense of humor. Michael would always brag to friends and family how proud he was of their accomplishments. Michael and I lived only ten minutes apart, and we would have dinner once or twice per week.

7. Michael loved being a fireman. Helping people was what fueled him. On September 11, 2001, Michael was on a cruise in Florida. As soon as he heard of the attacks, he got off the boat, took his stuff, and rented a car to drive back to New York. Michael got back to New York on September 12th or 13th and went straight to Ground Zero to start digging through the rubble. He worked on the pile for at least three months. Michael would work fifteen hours per day on the pile, and, on his off days, he would go to a fellow officer's funeral.

8. In the years after 9/11, the FDNY would conduct health screenings, and I kept telling Michael to get one. He'd go every year, but the scans never picked up on the cancer. By the time the cancer was detected, it was too late. Michael was diagnosed with Stage IV lung cancer in late December 2010. He went to Sloan Kettering, where he went through chemotherapy and other treatments for a few months. The treatments caused him to lose his hair and have chronic nausea. He lost weight and often looked frail. We did our research to get him the best care possible. We looked into experimental studies at Hackensack, Montefiore, Duke University, and Anderson Hospital. Anytime he had an appointment, either myself, my wife, or my daughter Allison would accompany him. Sometimes, our mother would come as well, but Michael's cancer was a source of great pain for her and she became too emotional.

9. We kept the faith that Michael would get better, but we knew his prognosis was grim. I am a pharmacist, and my sister is an ophthalmologist. When we heard that Michael had stage IV lung cancer, we knew it was a death sentence. It meant that he only had about a year or year and a half to live. I told my brother I'd be with him every step of the way, but I was always honest with him. I told him the chances of beating this cancer was slim to none. Michael made me his healthcare proxy. I tried the best I could to make him as comfortable as possible at the end. That was very painful, because my mom wanted to keep him alive no matter what.


10. Anything that Michael wanted to do in his last year of life, he did. He came to my daughter's college graduation and celebrated my mother's 70th birthday by seeing a play on Broadway. When Michael's body started to fail, we stepped in to take care of him. The cancer had spread to his brain, and in February 2012, he could no longer walk. In June 2012, we brought him to the hospital, and they recommended that we admit him to hospice care. The doctor explained that he was close to the end and no further treatments would help him. Michael broke down and cried. He never felt sorry for himself, but it was obvious that he didn't want to die and leave us all behind. Although they tried to keep him comfortable, it was clear that Michael was in constant pain. Michael stayed in hospice from the end of June until the middle of September 2012. He passed away peacefully on September 17th, 2012, with his family around him.

11. Michael always said, "The key to a great life is health and a selective memory." He had a great life up until the time he got sick. He also loved the Beatles. When he was in hospice, they'd come around with a guitar and he'd ask them to play the song "Norwegian Wood." The man could barely move, but that song always brought a smile to his face. Mike had always listened to the radio station Q104 every day at 12 noon because they would play Beatles tunes. Sometimes when I go and visit the cemetery, I'll turn on the radio for him. A few times Norwegian Wood would come on, and I'd think, "Really, Mike?" I know he is with us. We all think about Michael and miss him all the time.

12. Anyone who knew Michael loved him. He was good to a lot of people. After his death, we sold t-shirts to raise money to buy a Fire Department van in memory of Michael, which was used to transport any firefighter who needed health-related transport. Michael was so fondly remembered by his brothers for all he did. Michael was a good man. He is greatly missed.


ANTHONY BEHETTE

Sworn to before me this
7 day of May, 2022


Notary Public

BRETT COHEN
NOTARY PUBLIC, State of New York
NO. 01CO4701867
Qualified in Kings County 23
Commission Expires March 30, 2023

